

ORIGINAL

08 - 295

DEFENDANTS

1. PAMELA A. DARLING,

Justice of the Peace Court # 16 for Kent County
480 Bank Lane
Dover, DE 19904

Charges:

- Deprivation of rights under the color of law
- Abuse of service of process
- Violation of the oath of the office
- Violations of Rules of Judges' Professional Conduct

2. MERRILL C. TRADER

Judge of the Court of Common Pleas of Kent County
38 The Green
Dover, DE 19901

Charges:

- Deprivation of rights under the color of law
- Tampering with a witness, victim, or an informant
- Violation of the oath of the office
- Violations of Rules of Judges' Professional Conduct

3. ROSEMARY BETTS BEAUREGARD

Judge of the Court of Common Pleas of Sussex County
1 The Circle, Suite 1
Georgetown, DE 19947

Charges:

- Deprivation of rights under the color of law
- Collusion
- Tampering with a witness, victim, or an informant
- Violation of the oath of the office
- Violations of Rules of Judges' Professional Conduct

4. ROBERT B. YOUNG

Judge of the Superior Court of the Kent County
38 The Green
Dover, DE 19901

Charges:

- Deprivation of rights under the color of law
- Trespassing & treason
- Obstruction of justice

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U.S. DISTRICT COURT
DISTRICT OF DELAWARE
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- Collusion, coercion, intimidation
- Violation of the oath of the office
- Violations of Rules of Judges' Professional Conduct

5. WILLIAM L. WITHAM

Judge of the DE Superior Court for Kent County
38 The Green
Dover, DE 19901

Charges:

- Conspiracy against rights
- Obstruction of Justice and Collusion
- Violations of Rules of Professional Conduct

6. JACK B. JACOBS

7. CAROLYN BERGER

8. HENRY DUPONT RIDGELY

Judges of the Supreme Court of Delaware
55 The Green
Dover, DE 19903

Charges:

- Conspiracy against rights
- Violation of the oath of the office
- Violations of Rules of Judges' Professional Conduct

9. MYRON T. STEEL

Chief Judge, Court on the Judiciary
34 The Circle
Georgetown, DE 19947

Charges:

- Conspiracy against rights
- Violation of the oath of the office
- Violations of Rules of Judges' Professional Conduct

10. LIGUORI, MORRIS & YIENGST

Attorney at Law
46 The Green
Dover, DE 19901

Charges against the Partner, Gregory Morris:

- Fraud and Collusion
- Conspiracy against rights
- Violations of Rules of Professional Conduct

11. YOUNG, CONAWAY, STARGATT & TAYLOR LLP

The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 198899-0391

Charges against the firm's attorney, Monté T. Squire:

- Abuse of service of process
- Conspiracy against rights
- Fraud, Collusion, Intimidation
- Violations of Rules of Professional Conduct

12. LINDA LAVENDER

Court of Common Pleas Court Reporter
38 The Green
Dover, DE 19901

Charges:

- Tampering with a witness, victim, or an informant
- Collusion

13. SHEILA A. DOUGERTY

Chief Court Reporter at Superior Court
For Kent County
38 The Green
Dover, DE 19901

Charges:

- Obstruction of justice
- Collusion

FEDERAL COURT FOR THE DISTRICT OF DELAWARE

COMPLAINT

Here come the Plaintiff, Nina Shahin, and files the Complaint against Delaware judges (from the Justice of the Peace to the Chief Judge of the Delaware Supreme Court), two law firms, and two court reporters who together operated as a corrupt and racketeering organization denying the Plaintiff the benefits of the US Constitution, federal laws, rules of civil procedures of relevant courts or cover up of all the violations (service of process, due process, equal protection, and a fair trial). One of the judges and a law firm related to the judge was engaged in coercion, intimidation and retaliation. Court reporters were engaged in falsification of transcripts of court hearing to tamper with testimonies of witnesses, plaintiff, and attorney or to change the character, scope, and nature of court hearings.

The charges stem from three cases the Plaintiff filed in the Delaware Courts against the same Defendant, Delaware Federal Credit Union (presently called Del-One). The first two originated in the Justice of the Peace Court # 16 of the Kent County. One of those cases was appealed to the Supreme Court of the United States but the Writ of Certiorari was denied; the second one is presently on appeal at the Superior Court of Delaware. The third case was initiated at the Superior Court and is presently on Appeal at the Supreme Court of Delaware.

FIRST CASE (Chronologically the second filed)

The case was filed in the Justice of the Peace Court # 16 of the Kent County on 06/28/2005 and was given the docket number J0507004516. The Justice of the Peace judge, Pamela Darling, denied the Plaintiff the service of process by failing to mail a

copy of the Defendant's response, during hearing denied their right to question a witness whom they had subpoenaed to the court, denied them the opportunity to present their evidence and testimony and ruled against the plaintiff in violation of the provisions of the Regulation CC which was the law governing the case.

The case was appealed to the Court of Common Pleas of the Kent Country and was docketed under # 05-09-0074AP. During hearing on the Attorney's Motion for Summary Judgment held on 12/21/2005 the presiding judge, Merrill C. Trader, mocked and dismissed the Plaintiff's responses, while allowing false statements made by the attorney to stand and eventually ruled against the Plaintiff in violation of the terms on which the Summary Judgment can be granted. The transcript of that hearing was modified to change the nature of the Plaintiff's claims as well as the scope and character of the proceedings.

The case was appealed to the Superior Court of Delaware and docketed under the docket # C.A. No. 06A-01-004. The presiding judge, Robert B. Young, falsified the decision of the JP Court to a completely opposite conclusion (which is an offense of obstruction of justice as defined under 18 U.S.C. § 1506) and ruled against the Plaintiff.

The case was appealed to the Supreme Court of Delaware and was docketed under # 472, 2006. In violation of the provisions of Rule 25 of the Supreme Court Rules of Civil Procedure the Attorney filed a Motion to Affirm which the panel of three Judges (Berger, Jacobs and Ridgely) affirmed thus providing a cover up for violations in all courts.

Complaints against actions of the judges: Pamela Darling and Merrill C. Trader were dismissed without any proper reasoning (except that the Plaintiff did not agree with

the decision which was true, especially since the decision was in violation of governing law), by the Court on the Judiciary providing another cover up for the constitutional violations of the Plaintiff's rights and professional dishonesty of judges.

Writ of Certiorari filed to the Supreme Court of the US was denied.

SECOND CASE (Chronologically filed as first).

The case was filed on 04/24/2005 and was docketed under # J0506073516. During hearing on this case the Plaintiff was denied the benefit of the facts and circumstances of the case and ruled against on the basis of the unproven false fact.

The case was appealed to the Court of Common Pleas of the Kent Country, was docketed under # 05-10-0113 AP. The hearing on the appeal was held in private chambers of the judge, Merrill C. Trader, on 01/17/2007 with *ex parte* communications of attorney and the defendant with the presiding judge, Rosemary Betts Beauregard, who ruled in favor of the Defendant based on facts never proven in the courtroom. The transcript of the hearing was falsified in such a way as to change the essence of witness and Plaintiff testimonies, and the attorney's closing words. Access to the transcript was denied by the Court of Common Pleas and the Superior Court providing further cover up for the obstruction of justice and collusion committed by the judges, attorney, and the court reporter. The transcript of the hearing on the Plaintiff's motion for the access to the tape of hearing at CCP court held at the Superior Court in September of 2007 was also falsified to change the character, scope and the nature of that hearing.

The case was appealed to the Superior Court and was docketed under # 07C-02-001 WLW and is currently still there under appeal with Plaintiff and the Attorney having filed their respective Briefs.

THE THIRD CASE

The third Case for different violations of federal laws, personal injury, and perjury was filed by the Plaintiff at the Superior Court of the Kent County on 10/20/2006 seeking damages above \$ 100,000 and was assigned also to the judge, Robert B. Young, and docketed under # 06C-10-027 RBY. The original attorney, Gregory Morris, (from the defendant's firm of Liguori, Morris and Yiengst) was substituted in violation of the provision of the rule 90(b) of the Superior Court Rules of Civil Procedure by an attorney from another Defendant's law firm owned by a brother of the presiding judge, Stuart B. Young (Young Conaway Stargatt & Taylor, LLP). The new Attorney, Monté T. Squire, filed a Motion for Judgment on Pleading without a proper Notice of hearing to the Plaintiff. As a result the hearing on the Motion either did not take place or was held in *ex parte* communications between the presiding judge and the attorney and the decision was taken against the Plaintiff as a result of collusion between the judge and the attorney in a complete exclusion of the Plaintiff from the judicial process. The decision ignored provisions of different laws adopted by the US Congress in protection of consumer rights. In addition, when the case was on appeal to the Supreme Court of Delaware, the judge, Robert B. Young, entered a decision awarding attorney fees to the illegitimate attorney as a trespassing decision when he had no jurisdiction over the matter. That decision was aimed at coercing and intimidating the Plaintiff to stop filing lawsuits seeking damages and fair trials as well as satisfaction of her constitutional rights and benefits of other federal laws.

The case was appealed to the Supreme Court of Delaware where it is currently on appeal under docket # 93, 2007 after the Plaintiffs and the Attorney having filed their respective Briefs. The Plaintiff expressed doubts on the possibility of a fair trial in this case and requested the case to be transferred to another state jurisdiction.

The Plaintiff was denied a fair trial in every court in the state of Delaware with judges, attorneys and court reporters acting in collusion to subvert the Plaintiff's constitutional rights, committing obstruction of justice, fraud and racketeering. The Plaintiffs seeks the damages in the amount of \$ 9,000,000 (triple amount of \$1,000,000 for each case) and will hold all Defendants jointly and severally liable for the entire amount of damages.

The lawsuit is filed under the RICO Act, Obstruction of Justice (sections 1506, 1512, 1513), Civil Rights sections 241 and 242 of Title 18 of the U.S. Code and has a federal jurisdiction under 18 U.S.C. 1512(h).

The Plaintiffs is asking for a trial with a Jury.

The Complaint has been submitted on this 16th day of May, 2008.

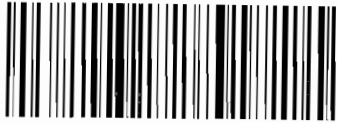
For the Plaintiff



Nina Shahin
103 Shinnecock Rd.
Dover, DE 19904

Tel. # 302-678-1805

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US STATES COURT FOR THE DISTRICT OF ~~DELA~~
844 KING STREET
US COURTHOUSE
WILMINGTON, DE 19801

U.S.M.S.
X-RAY

JS 44 (Rev. 12-07)

ORIGINAL**CIVIL COVER SHEET**

08-295

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS**NINA SHAHIN**

(b) County of Residence of First Listed Plaintiff **KENT**
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

pro se**DEFENDANTS****SEE A SEPARATE SHEET WITH NAMES & CHARGES**

County of Residence of First Listed Defendant **KENT**
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 630 Liquor Laws	PROPERTY RIGHTS	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	PERSONAL PROPERTY	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 650 Airline Regs.	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 380 Other Personal Property Damage	LABOR	SOCIAL SECURITY	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury		<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities/Exchange
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
			<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	FEDERAL TAX SUITS	<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	IMMIGRATION	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	Habeas Corpus:	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee		<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other			<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 550 Civil Rights			
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 555 Prison Condition			

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

18 U.S.C. § 1506, 1512(c), 1512(h)

Brief description of cause:

Racketeering, obstruction of justice

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) Supreme Court of DE, docket # 93,2007

IF ANY Superior Court

(See instructions):

JUDGE **William L. Witham**

DOCKET NUMBER **07A-02-001 BLW**

DATE

May 16, 2008

SIGNATURE OF ATTORNEY OF RECORD

Nina Shahin

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

60:3 PM 20 02 2008
FILED
U.S. DISTRICT COURT
DISTRICT OF DELAWARE